

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC., ALTERNET  
MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

No. 1:24-cv-01514-SHS

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE THAT** upon the annexed Memorandum of Law, the Declaration of Stephen Stich Match, and the exhibits thereto, the undersigned hereby moves this Court on behalf of Plaintiffs Raw Story Media, Inc., and AlterNet Media, Inc. for an order granting reconsideration of the orders granting Defendants' motion to dismiss and denying Plaintiffs leave to amend their complaint, ECF Nos. 117, 137, and permitting Plaintiffs to file an amended complaint within seven days of the Court's order granting this motion.

RESPECTFULLY SUBMITTED,

/s/ Stephen Stich Match

Jon Loevy (*pro hac vice*)  
Michael Kanovitz (*pro hac vice*)  
Matthew Topic (*pro hac vice*)  
Stephen Stich Match (No. 5567854)  
Thomas Kayes (*pro hac vice*)  
Steven Art (*pro hac vice*)  
Kyle Wallenberg (*pro hac vice*)

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